

*** Enforcement Confidential ***
REGION 6 EXECUTIVE SUMMARY
(one page)

857761

DATE: September 10, 2008
TOPIC: Gulfco Marine Maintenance (Gulfco)
Updated Demand for Past Costs
DEADLINE/DUE DATE: As soon as possible



Division Director

ACTION REQUIRED: Approve and Sign the letter

BACKGROUND: The Gulfco Site, located on the north bank of the Intracoastal Waterway in Freeport, TX, was a former barge cleaning, servicing, and waste disposal facility that operated from 1971 through 1998. Barges brought to the facility were cleaned of waste oils, caustics, and organic chemicals, and the wash waters generated were stored in three unlined surface impoundments. Hazardous substances at the Site include volatile organic compounds, semi-volatile organic compounds, pesticides, polychlorinated biphenyls, and metals. The Site was final on the NPL effective May 30, 2003.

CURRENT STATUS:

The Gulfco Restoration Group, a group of PRPs including Dow Chemical, LDL Coastal Limited, and Sequa Corporation, is currently performing the RI/FS under a UAO. In December 2007, the UAO was amended to add Parker Drilling Offshore Corporation (Parker) to the UAO.

EPA issued a demand for past costs in July 2004, at which time the costs were about \$168K. The costs are now at \$875K. On June 11, 2008, EPA sent a "Letter Referral" to Department of Justice asking for their assistance in negotiating a CD for the remedial action. DOJ recommended sending an updated cost recovery demand to all of the PRPs to renew their attention on the issue of past costs.

TECHNICAL CONCERNS: None known.

COMMUNITY CONCERNS: None known.

FUTURE/RECOMMENDED ACTIONS: The site team recommends that the DD sign the letter.

CONTACTS/TELEPHONE NUMBER: Gary Miller, RPM, x8318; Barbara Nann, attorney, x2157; Barbara Aldridge, enforcement, x2712



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